

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

STATE OF OKLAHOMA, et al.

Plaintiffs,

v.

TYSON FOODS, INC., et al.

Defendants.

Case No. 4:05-cv-00329-GKF-PJC

I, Tony Wayne Hallum, II, having been duly sworn, under oath, state that the following facts are true and correct to the best of my knowledge, information, and belief:

1. This Affidavit is based on my personal knowledge and/or on information assembled by employees of Tyson, of which I am informed and believe to be true. I would and could competently testify to the matters stated in this Affidavit if called as a witness.


2. I am a resident of Tahlequah, Oklahoma, and a member of the Cherokee Nation.

3. I am employed as a Technical Advisor in the Live Production Department of Tyson Chicken Inc.'s Noel Complex.

4. In the course of my employment with Tyson, I periodically visit the farms of numerous independent contract poultry producers ("Contract Growers") in order to make recommendations and provide management tips and suggestions regarding the production of poultry.

5. Many of the Contract Growers who produce poultry for Tyson are members of the Cherokee Nation.

6. I am opposed to this lawsuit. In addition, many Contract Growers who are members of the Cherokee Nation are opposed to this lawsuit.


Tony W. Hallum, II

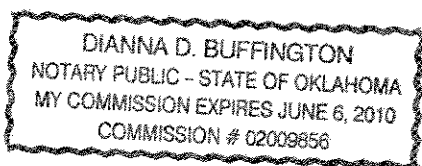
STATE OF Oklahoma)
COUNTY OF Cherokee) ss

SUBSCRIBED AND SWORN to before me, a notary public, on this
19 day of January, 2009.



Notary Public

My Commission Expires: June 6, 2010



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